

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

**JENNIFER PIGGOTT and SLADE)
PIGGOTT,)**

Plaintiffs,)

v.)

GRAY CONSTRUCTION, INC.,)

Defendant/Third-Party Plaintiff,)

v.)

**COOPER'S STEEL FABRICATORS, INC.,)
ALL-SOUTH SUBCONTRACTORS,)
FREELAND HARRIS CONSULTING)
ENGINEERS OF KENTUCKY, INC.,)
FREELAND HARRIS CONSULTING)
ENGINEERS OF GEORGIA, INC. THE)
HARDY CORPORATION, LATTA)
PLUMBING & CONSTRUCTION CO., INC.,)
HWASHIN AMERICA CORPORATION and)
FIRESTONE BUILDING PRODUCTS CO.,)
LLC,)**

Third-Party Defendants.)

Civil Action Number:

2:06-cv-01158-MEF

Honorable Chief Judge Mark E. Fuller

**FREELAND HARRIS CONSULTING ENGINEERS OF GEORGIA, INC.'S
OPPOSITION TO MOTION TO SEVER**

COMES NOW, the Third-Party Defendant, Freeland Harris Consulting Engineers of Georgia, Inc. opposes the Plaintiffs' Motion to Sever (Doc. 132) for the reasons stated in the briefs recently filed on behalf of All-South Subcontractors, Inc. and Firestone Building Products, LLC (Doc. 152), and Latta Plumbing & Construction Co., Inc. (Doc. 153).

/s/ John C. DeShazo

JOHN M. LANEY, JR., ESQ. (LAN007)

JOHN C. DeSHAZO, ESQ. (DES007)

Attorneys for Third-Party Defendant

Freeland Harris Consulting Engineers of Georgia, Inc.

OF COUNSEL:

LANEY & FOSTER, P.C.

Post Office Box 43798

Birmingham, Alabama 35243-0798

Telephone: (205) 298-8440

Facsimile: (205) 298-8441

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2007, I electronically filed the foregoing with the Clerk of Court using the US District Court Filing System which sends information of such filing to Counsel of Record in this cause and those not registered with the US District Court Filing System for electronic notification have been served by US Mail.

Attorneys for Third-party Plaintiffs

Jennifer Piggott & Slade Piggott

Jere L. Beasley, Esq.

Julia Ann Beasley, Esq.

Beasley Allen Crow Methvin Portis & Miles

Post Office Box 4160

Montgomery, Alabama 36103-4160

Attorneys for Intervener / Plaintiff

Hwashin America Corporation

James A. Rives, Esq.

William Christopher Waller, Jr., Esq.

Ball Ball Mathews & Novak, PA

Post Office Box 2148

Montgomery, Alabama 36102-2148

Attorneys for Intervener / Plaintiff

Hwashin America Corporation

J. Lister Hubbard, Esq.

Richard H. Allen, Esq.

Arden Reed Pathak, Esq.

Capell & Howard, P.C.

Post Office Box 2069

Montgomery, Alabama 36102-2069

Attorney for Intervener / Plaintiff

Hwashin America Corporation

Linda C. Ambrose, Esq.

Rogers & Associates

3000 Riverchase Galleria, Suite 650

Birmingham, Alabama 35244

Attorney for Third-Party Defendant

Latta Plumbing and Construction Co., Inc.

Constance C. Walker, Esq.

Felicia Abernathy Long, Esq.

Thomas T. Gallion, III, Esq.

Haskell Slaughter Young & Gallion, LLC

Post Office Box 4600

Montgomery, Alabama 36104

Attorneys for Defendant / Third-Party Plaintiff

Gray Construction, Inc.

Brian Michael McClendon, Esq.

Elliott Britton Monroe, Esq.

Mickey B. Wright, Esq.

Lloyd Gray & Whitehead, P.C.

2501 Twentieth Place South, Suite 300

Birmingham, Alabama 35223

**Attorney for Third-Party Defendant
Cooper Steel Fabricators**

A. Joe Peddy, Esq.
Robert B. Stewart, Esq.
Smith Spires & Peddy, P.C.
2015 Second Avenue North, Suite 200
Birmingham, Alabama 35203

**Attorney for Third-Party Defendant
Firestone Building Products Co., LLC**

Kenneth M. Perry, Esq.
Brittin T. Coleman, Esq.
Hope T. Cannon, Esq.
Bradley Arant Rose & White LLP
1819 Fifth Avenue North
Birmingham, Alabama 35203

**Attorney for Third-Party Defendant
The Hardy Corporation**

Larry W. Harper, Esq.
Porterfield, Harper, Mills & Motlow, P.A.
Post Office Box 530790
Birmingham, Alabama 35253-0790

**Attorney for Third-Party Defendant Freeland
Harris Consulting Engineers of Kentucky, Inc.**

Charles Keith Hamilton, Esq.
John W. Clark, IV, Esq.
Bainbridge Mims Rogers & Smith
Post Office Box 530886
Birmingham, Alabama 35253-0886

**Attorney for Third-Party Defendant
All-South Subcontractors, Inc.**

John S. Somerset, Esq.
Sudderth & Somerset
5385 First Avenue North
Birmingham, Alabama 35212

/s/ John C. DeShazo

OF COUNSEL

